

# **EXHIBIT**

## **No. 19**

**EXCERPT FROM MOTOROLA'S PRIVILEGE LOGS DETAILING:**

- 1. THE SPREADSHEETS IDENTIFIED IN PLAINTIFFS' EXHIBIT I; AND**
- 2. THE ATTORNEY-CLIENT COMMUNICATIONS (E-MAILS) TO WHICH THEY ARE ATTACHED.**

Identification of Senders/Recipients:

Michael Annes, Esq., Attorney, Motorola Legal Department

John Garner, Esq., Attorney, Motorola Legal Department

Jeff Moran, Esq., Attorney, Motorola Legal Department

Amy Hardy, Esq., Attorney, Motorola Legal Department

Barry Medintz, Esq., Attorney, Motorola Legal Department

Randy Papetti, Esq., Attorney, Lewis and Roca, LLP

Cory Talbot, Esq., Attorney, Lewis and Roca, LLP

Emily Cates, Esq., Attorney, Lewis and Roca, LLP

Kam Pebler, Paralegal, Lewis and Roca, LLP

DOCUMENT NO.	DATE	TIME	DESCRIPTION	PRIVILEGE	STATUS	PRODUCTION LOG DATE
MCG000794-0795	01/28/04	1:24 p.m.	Email from Michael Annes to John Garner re: Manufacturer Reps - next steps	Attorney/Client	Withheld	11/21/05
MCG000796-0996	Undated		MR 2004 projection with new analysis perf criteria1.xls prepared at counsel's request	Work Product	Withheld	11/21/05
MCG001925	1/28/2004	12:00 p.m.	Email from Julie Blair to John Garner, David Bendsted, Nina Guibor, Kim Crawford, Steve Machernis, Kevin Parslow, Michael Annes, Janie Nevarez Re: Manufacturer Reps - next steps	Attorney/Client	Withheld	11/21/05
MCG001926-2125	Undated		MR 2004 projection with new analysis perf criteria1.xls prepared at request of counsel	Work Product	Withheld	11/21/05
MCG002456 - 2457	01/22/04	5:36 p.m.	Email from Julie Blair to Kevin Parslow, Steven Machernis, Kim Crawford cc: Nina Guibor, David Bensted, John Garner Re: MR Financial Analysis & Performance Data Request	Attorney/Client	Withheld	11/21/05
MCG002458 - 2653	Undated		Excel MR 2004 projection with new analysis perf criteria.xls created at direction of counsel	Work Product	Withheld	11/21/05

	DATE	TIME	DESCRIPTION	PRIVILEGE	STATUS	PRODUCTION LOG DATE
MCG002760-2771	02/02/04	5:50 p.m.	Email from Julie Blair to John Garner, David Bensted, Kim Crawford, Nina Guibor, Steven Machernis, Kevin Parslow cc: Michael Annes, Randy Papetti Re: Manufacturer Reps - next steps	Attorney/Client	Withheld	11/21/05
MCG002772-2971	Undated		MR 2004 projection with new analysis perf criteria.xls created at direction of counsel	Work Product	Withheld	11/21/05
MCG003189-3194	02/01/03	10:11 p.m.	Email from Kim Crawford to David Benstad, Julie Blair, Kim Crawford, Nina Guibor, Steve Machernis, Kevin Parslow, John Garner cc: Michael Annes, Randy Papetti Re: Crawford Inputs - Manufacturer Reps	Attorney/Client	Withheld	11/21/05
MCG003195-3386	Undated		MR 2004 projection with new analysis perf criteria.xls created at direction of counsel	Work Product	Withheld	11/21/05
MCG003611	02/06/04	5:07 p.m.	Email from Steven Machernis to Randy Papetti cc: David Bensted, Julie Blair, John Garner Re: RT Technologies Performance Analysis	Attorney/Client	Withheld	11/21/05
MCG003612-3821	Undated		MR 2004 projection with new analysis perf criteria.xls prepared at direction of counsel	Work Product	Withheld	11/21/05
MCG005096	08/10/04	9:16 a.m.	Email from Julie Blair to Steven Machernis cc: Randy Papetti, Tom Nallen Re: June MR commissions computed	Attorney/Client	Withheld	11/21/05
MCG006222-6437	03/23/04		MR 2004 projection with new analysis perf criteria.xls prepared at direction of counsel	Work Product	Withheld	11/21/05
MOT 00861	01/22/04	4:09 p.m.	E-mail from Julie Blair to David Bensted, John Garner re MR Summary Info. XLS - updated	Attorney/client	Withheld	07/06/05
MOT 00862	Undated		Spreadsheet of MR Summary Info.	Work product	Withheld	07/06/05

			DESCRIPTION	PRIVILEGE	STATUS	PRODUCTION LOG DATE
MOT 00864	01/22/04	4:36 p.m.	E-mail from Julie Blair to Julie Blair, Kevin Parslow, Steven Machernis, Kim Crawford, cc Nina Guibor, David Bensted, John Garner re MR Financial Analysis and performance Data Request	Attorney/client	Withheld	07/06/05
MOT 00865-878	Undated		MR 2004 Projection with new analysis per criteria - XLS	Work product	Withheld	07/06/05
MOT 00879	01/22/04	4:36 p.m.	E-mail from Julie Blair to Julie Blair, Kevin Parslow, Steven Machernis, Kim Crawford cc Nina Guibor, David Bensted, John Garner re MR Financial Analysis and Performance Data Request	Attorney/client	Withheld	07/06/05
MOT 00880-893	Undated		MR 2004 Projection with New Analysis Perf. Criteria – XLS	Work product	Withheld	07/06/05
MOT 00896-897	01/23/04	8:48 a.m.	E-mail string from Julie Blair to John Garner cc David Bensted, Michael Annes, Kevin Parslow, Nina Guibor, Kim Crawford, Steven Machernis re: Manufacturer's Rep. Agreement	Attorney/client	Withheld	07/06/05
MOT 00898	Undated		MR Summary Info. – XLS	Work product	Withheld	07/06/05
MOT 00908	01/28/04	11:00 a.m.	E-mail from Julie Blair to John Garner cc David Bensted, Nina Guibor, Kim Crawford, Steven Machernis, Kevin Parslow, Michael Annes, Janie Nevarez re Manufacturer's Rep's – Next Steps	Attorney/client	Withheld	07/06/05
MOT 00909-922	Undated		MR 2004 Projection with New Analysis Perf. Criteria 1-XLS	Work product	Withheld	07/06/05
MOT 00934-937	02/01/04	10:11 p.m.	E-mail string from Kim Crawford to John Garner, David Bensted, Julie Blair, Nina Guibor, Steven Machernis, Kevin Parslow, cc Michael Annes, Randy Papetti re Crawford input – Manufacturer Rep	Attorney/client	Withheld	07/06/05

NO.				PRIVILEGE	STATUS	PRODUCTION LOG DATE
MOT 00938-956	Undated		Crawford MR 2004 Projection with New Analysis Perf. Criteria – XLS	Work product	Withheld	07/06/05
MOT 00961-965	02/02/04	4:50 p.m.	E-mail string from Julie Blair to John Garner, David Bensted, Kim Crawford, Nina Guibor, Steven Machernis, Kevin Parslow, cc Michael Annes, Randy Papetti re Manufacturer Rep – Next Steps	Attorney/client	Withheld	07/06/05
MOT 00966-983	Undated		Manufacturer Rep Data for 2004 (MR 20041.XLS)	Work product	Withheld	07/06/05
MOT 02169	08/27/04	3:42 p.m.	E-mail string from John Garner to Michael Annes Re: C&S – Clark Conversation	Attorney/client	Withheld	07/06/05
MOT 01622-1633	Undated		Workbook MR 2004 project with new analysis perf criteria.xls prepared at counsel's request	Work Product	Withheld	11/21/05
MOT 02913 – 02914	01/29/04	7:06 p.m.	E-mail string from John Garner to Randy Papetti cc: David Bensted; Michael Annes Re: Manufacturer Reps. – Next Steps	Attorney/Client	Withheld	11/21/05
MOT 02915 – 03114	Undated		Excel Spreadsheet - MR Projections prepared at counsel's request	Work Product	Withheld	11/21/05
MOT 03382 – 03387	02/01/04	10:11 p.m.	E-mail string from Kim Crawford to John Garner; David Bensted; Julie Blair; Nina Guibor; Steven Machernis; Kevin Parslow cc: Michael Annes & Randy Papetti Re: Crawford Inputs – Manufacturer Reps	Attorney/Client	Withheld	11/21/05
MOT 03388 – 03579	Undated		Excel Spreadsheet - - MR Projections prepared at counsel's request	Work Product	Withheld	11/21/05
MOTJ 01241	1/22/04	5:09 p.m.	Email to David Bensted and John Garner from Julie Blair re: MR_Summary_info.xls update	Attorney/Client Work Product	Withheld	11/21/05
MOTJ 01242	1/22/04		Spreadsheet MR-Summary_info.xls prepared at counsel's request	Work Product	Withheld	11/21/05

				PRIVILEGE	STATUS	PRODUCTION LOG DATE
MOTJ 1243	1/22/04	5:36 p.m.	Email string to Julie Blair, Kevin Parslow, Steve Machernis, Kim Crawford, cc Nina Guibor, David Bensted, John Garner re: MR Financial Analysis & Performance Data Request	Attorney/Client Work Product	Withheld	11/21/05
MOTJ 01244-1253	1/22/04		Workbook re: MR 2004 projection with new analysis perf criteria.xls, Hi_Lo summary prepared at counsel's request	Work Product	Withheld	11/21/05
MOTJ 01316	1/23/04	9:49 a.m.	Email string to John Garner, cc David Bensted, Michael Annes, Kevin Parslow, Nina Guibor, Kim Crawford, Steve Machernis from Julie Blair re: Manufacturer's Rep Agreement Issues	Attorney/Client Work Product	Withheld	11/21/05
MOTJ 01317	1/26/04		Spreadsheet MR_Summary_info.xls prepared at counsel's request	Work Product	Withheld	11/21/05
MOTJ 01575-1581 <sup>1</sup>	2/3/04		Workbook MR 2004 projection with new analysis perf criteria.xls prepared at counsel's request with handwritten notes of counsel Randy Papetti	Work Product	Withheld	11/21/05
MOTJ 01650-1651	3/23/04	8:00 p.m.	Email string to Julie Blair, Kim Crawford, Steve Machernis, cc Dana Huth, John Garner, Tom Nallen from Randy Papetti re: Manuf Rep – Currant Action Status – Impact on Commissions	Attorney/Client Work Product	Withheld	11/21/05
MOTJ 01659	Undated		Spreadsheet Crawford MR 2004 projection with new analysis perf criteria.xls prepared at counsel's request	Work Product	Withheld	11/21/05
MOT 01661	Undated		Spreadsheet Crawford MR 2004 projection with new analysis perf criteria.xls prepared at counsel's request	Work Product	Withheld	11/21/05

<sup>1</sup> MOTJ 01575-1581 contains hand-written notes from Mr. Randy Papetti, Motorola's litigation counsel.

				PRIVILEGE	STATUS	PRODUCTION LOG DATE
MOTJ 01664-1665	Undated		Spreadsheet MR 2004 projection.xls prepared at counsel's request	Work Product	Withheld	11/21/05
MOT 02512-02517 <sup>2</sup>	Undated		Spreadsheet depicting performance analysis	Unknown	Redacted	Produced on 7/6/05 and 11/09/05

---

<sup>2</sup> MOT 02512-02517 was produced in redacted form on 7/06/05 and in unredacted form on 11/09/05 and had been used by Plaintiffs at several depositions as Exhibit 20.